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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application of

Applicant : Dan Thaxton
Serial No. : 10/079,679
Filed : February 20, 2002
Title : DOCUMENT SECURITY PROTECTION ANALYSIS ASSISTANT
Docket : STD 1067 PA
Examiner : Kamal, Shahid
Art Unit : 3714
Conf. No. : 6750

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Prior to filing an appeal brief in the present application, and concurrently with filing a Notice of Appeal, Applicant submits this request for review of the final rejection of March 9, 2010. No amendments are filed with this response.

Summary of Applicant's Position

The Rhoads reference does not disclose the steps recited in the rejected claims 1 - 20. The Rhoads reference does not disclose assessing the security value and compatibility of various, selected security features. The Rhoads reference does not disclose revising the security features to resolve compatibility issues. The Rhoads reference does not disclose evaluating the relative ratings of selected security features to determine a security rating for a specific document under consideration. The Rhoads reference does not disclose presenting the security rating for the document on a

display. Finally, the Rhoads reference does not disclose performing any of these steps using a computer.

Discussion of the Claims and the Rhoads Reference

The present application is directed to a method for presenting a user with a comprehensive set of security features that can be selected for a security document, for assisting the user in resolving any potential incompatibilities among selected security features, and for determining a document security rating for the document based on the security features that are selected. Examples of such security features used on printed security documents include pantographs, screens, tamper protection, flourishes, overt authentication, and covert authentication. The system of the present application displays a selection guide for the simple selection of desired security features for the design of a security document. After the user selects desired security features, the computer examines those selected security features for possible incompatibilities. The computer then presents any potential problems to the user with a description of the concerns. Additionally, the computer provides the user with recommended courses of action to resolve these concerns. Finally, the system provides the user with a document security rating, indicating how well the selected security features protect the document.

The Rhoads reference discloses none of this. Rhoads describes processes of embedding machine-readable multi-bit binary information in documents. The embedded information is usually not apparent to a human observer. The documents in Rhoads can also have either overt or subliminal calibration patterns. When a document that includes a calibration pattern is scanned, such as by a photocopier, the pattern facilitates detection of the encoded information. Rhoads does not disclose providing a quantified assessment of the security of a document, nor does it address the compatibility of multiple security features on the document.

The Examiner curiously points to a range of paragraphs in Rhoads as disclosing each step in the rejected claims. A careful review of Rhoads, however, reveals that it

teaches none of the steps. In the interest of brevity, the steps of claim 1 will be specifically considered.

The first step recited in claim 1 is "processing data relating to selected security features of said document using a computer, said security features each having associated compatibility and relative rating information." The Examiner points to the "abstract," ¶¶0004 - 0015, ¶0041, ¶0065, and ¶0069 of Rhoads as showing this step. However, none of these sections teach using a computer to process data related to security features. ¶¶0004 - 0013 describe prior art digital watermarking. ¶¶0014 - 0015 describe generally the Rhoads invention, namely, the use of a digital watermark and a calibration pattern. The Abstract of Rhoads is identical to ¶¶0014. ¶0041 of Rhoads discusses noise in watermarking algorithms. ¶0065 of Rhoads describes the calibration pattern that is used with the watermark. Finally, ¶0069 of Rhoads discusses the calibration pattern and the Fourier-Mellin transform of a calibration pattern tile (a small part of the larger calibration pattern). None of this disclosure in Rhoads relates to processing data relating to selected security features of a document.

The second step of claim 1 is "determining compatibility issues using the computer among said selected security features of said document" and the Examiner cites the abstract, and ¶¶0004 - 0015, and ¶0069 of Rhoads for this. However, none of these sections discuss compatibility of selected security features, let alone using a computer to determine such compatibility issues. ¶¶0004 - 0013 of Rhoads describe prior art digital watermarking. ¶¶0014 - 0015 of Rhoads describe the Rhoads invention, i.e., the use of a digital watermark and a calibration pattern. The Abstract of Rhoads is identical to ¶¶0014. Compatibility of various security features is simply not considered anywhere in the Rhoads reference.

The third step of claim 1 is "revising said selected security features of said document using said computer to resolve any compatibility issues." Again the Examiner points to even larger sections of Rhoads - ¶¶0004 - 0035, ¶0041, ¶0065, and the Abstract - but again the Rhoads reference is lacking an anticipating disclosure. As

explained in the previous paragraph ¶¶0004 - 0015 and the Abstract do not include any discussion of compatibility issues, let alone a disclosure of the step of revising security features to resolve compatibility issues using the computer. The same is true of ¶¶0016 - 0035 and ¶0065 of Rhoads. ¶¶0016 - 0027 of Rhoads describe the drawings of Rhoads, and ¶¶0028 - 0035 of Rhoads discusses techniques of embedding watermark data in line art. There is no disclosure in any of these paragraphs of using a computer to resolve compatibility problems among various security features that are to be incorporated in a security document.

The fourth step of claim 1 is "evaluating said relative rating information of said selected security features using said computer to determine a document security rating of said document." The Examiner points to the Abstract, ¶¶0004 - 0015, ¶0041, and ¶0065 of Rhoads for this disclosure. However, there is no disclosure in these paragraphs of relative rating information for security features, nor is there a disclosure anywhere in Rhoads of the step of determining a security rating for the document using a computer.

Finally, the fifth step of claim 1 is "presenting said document security rating of said document on a display of said computer." The Examiner cites ¶¶0004 - 0035, and ¶0041 of Rhoads for this. These paragraphs are discussed fully, above. None of these paragraphs disclose a security rating for a document, let alone providing such a security rating on the display of a computer.

Claims 2 - 19 depend either directly or ultimately from claim 1. These claims are therefore patentable over the Rhoads reference for the same reasons as addressed, above. Further, these claims call for additional features that are in no way suggested by Rhoads. Claim 20 is directed to a computer-readable medium that is capable of instructing a processor of a computer to evaluate security features of a document and rate the security level of a document. Rhoads does not teach a system that evaluates security features, nor one that rates the security level of a document. Finally, Rhoads

does not disclose performing the steps that the claimed computer readable medium instructs a computer processor to perform.

It is submitted that all of the claims currently presented in the instant application are in condition for allowance. The Rhoads reference simply does not include a disclosure that can be said to anticipate any of the claims in the instant application.

Respectfully submitted,
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